

## UNITED STATES DISTRICT COURT

## DISTRICT OF MASSACHUSETTS

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DONALD C. HUTCHINS	)	U.S. DISTRICT COURT DISTRICT OF MASS.
	)	
Plaintiff	)	Civil Action: <b>04-30126-MAP</b>
v.	)	
	)	
CARDIAC SCIENCE, INC., et al.,	)	
	)	
Defendants	)	
	)	

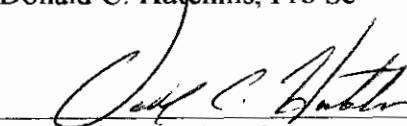
**PLAINTIFF'S ANSWER TO DEFENDANT'S MOTION TO STRIKE**  
**PLAINTIFF'S AMENDED COMPLAINT**

The Court granted Plaintiff, Donald C. Hutchins ("Hutchins") his motion to amend the complaint upon the addition of the Compliant Corporation ("Compliant") on December 22, 2004. Recent discovery produced by Compliant in the form of billing records attributed to this action, CA 04-30126-MAP indicate additional acts of conspiracy to commit patent and copyright infringement. There being no restrictions imposed by a management conference upon the entrance of Compliant, the Complaint was further amended to acknowledge this recent discovery.

The Ohio Court recognized these injudicious acts by allowing Hutchins' motion for sanctions against these same attorneys. While this amended complaint is not critical to Hutchins' position in this action, the malicious acts by these attorneys should serve to increase damages to Hutchins from Compliant in accordance with Title 35 United States Code, Section 285 as cited in the Original Complaint

The Plaintiff  
 Donald C. Hutchins, Pro Se

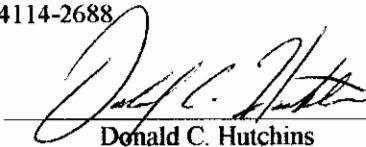
Dated, August 22, 2006

  
 1047 Longmeadow Street  
 Longmeadow, Massachusetts 01106  
 (413) 567-0606

CERTIFICATE OF SERVICE

I, Donald C. Hutchins, 1047 Longmeadow Street, Longmeadow, Massachusetts 01106, hereby certify that I served a copy of the foregoing on the appropriate party by sending a copy by first class mail to: Randall T. Skaar, Esq., Patterson, Thuente, Skaar & Christensen, P.A., 4800 IDS Center, 80 South Eighth St., Minneapolis, MN 55402. Paul T. Rothschild, Esq., Bacon & Wilson P.C., 33 State Street, Springfield, MA 01103 John J. Egan, Esq., Egan, Flanagan and Cohen, P.C., 67 Market Street, Springfield, MA 01102-9035, Jeffrey Lauderdale, Esq., Calfee, Halter & Griswold LLP, 1400 Mc Donald Investment Center, 800 Superior Ave., Cleveland, OH 44114-2688.

Dated: August 22, 2006



Donald C. Hutchins